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Counsel for Plaintiffs  
AMERICAN EXPRESS NATIONAL BANK  
and AMERICAN EXPRESS TRAVEL RELATED  
SERVICES COMPANY, INC.

**UNITED STATES DISTRICT COURT**  
**EASTERN DISTRICT OF CALIFORNIA**  
**SACRAMENTO DIVISION**

AMERICAN EXPRESS NATIONAL  
BANK, and AMERICAN EXPRESS  
TRAVEL RELATED SERVICES  
COMPANY, INC., a New York  
corporation;

Plaintiff,

vs.

WELCOME TRADER'S, a California  
corporation; REHMAN TRADER'S, a  
California corporation; SARIB  
REHMAN, an individual; and MEHLAB  
FATIMA, an individual;

Defendants.

Case No. 2:24-cv-03320-WBS-SCR

District Judge William B. Shubb  
Magistrate Judge Sean C. Riordan

**DECLARATION OF STEPHEN J.  
NEWMAN IN SUPPORT OF  
REQUEST FOR ENTRY OF  
DEFAULT**

Complaint Filed: November 27, 2024

1           **TO THE CLERK OF THE UNITED STATES DISTRICT COURT FOR**  
2           **THE EASTERN DISTRICT OF CALIFORNIA:**

3           I, Stephen J. Newman, Esq., declare as follows:

4           1.       I am a Partner at Steptoe LLP and one of the attorneys of record for  
5           Plaintiffs American Express National Bank (“AENB”) and American Express Travel  
6           Related Services Company, Inc. (“AETRS”) (collectively, “American Express”) in  
7           this action. I am licensed to practice law in the State of California. I have personal  
8           knowledge of the matters set forth in this Declaration and if called upon to testify in  
9           court, I could and would competently do so. I submit this declaration in support of  
10          American Express’ Request for Entry of Default.

11          2.       On February 5, 2025, at my direction, Welcome Trader’s, Rehman  
12          Trader’s, and Sarib Rehman were served the Summons, Complaint, and Civil Case  
13          Cover Sheet via personal service. The proofs of service were subsequently filed with  
14          this Court. True and correct copies of the filed proofs of service are attached hereto  
15          as **Exhibits A, B, and C.**

16          3.       On February 6, 2025, at my direction, Mehlab Fatima was served the  
17          Summons, Complaint, and Civil Case Cover Sheet via substituted service at her  
18          residential address by leaving the documents with a co-resident who was informed of  
19          the general nature of the papers. Personal service was attempted at least three times  
20          on Mehlab Fatima at multiple addresses, including her residential address. The  
21          proofs of service for all attempts of service, including the final substituted service,  
22          were subsequently filed with this Court. True and correct copies of the filed proofs of  
23          service are attached hereto as **Exhibit D.**

24          4.       To date, my office has not received a response to the Complaint from  
25          Defendants. As of today’s date, I also have not seen on the Court’s docket for this  
26          matter any response to the Complaint filed by Defendants.

5. Defendants are not minors. On information and belief, Defendants are not incompetent persons and are not in military service in the United States. No attorney has entered an appearance in this action on behalf of Defendants.

I declare under penalty of perjury under the laws of the United States and California that the foregoing is true and correct.

Executed this 7th day of March, 2025, at Los Angeles, California.

/s/ Stephen J. Newman  
Stephen J. Newman

**CERTIFICATE OF SERVICE**

I hereby certify that on March 7, 2025, a copy of the foregoing  
**DECLARATION OF STEPHEN J. NEWMAN IN SUPPORT OF REQUEST  
FOR ENTRY OF DEFAULT** was filed electronically and served by U.S. Mail on  
anyone unable to accept electronic filing. Notice of this filing will be sent by e-mail  
to all parties by operation of the court's electronic filing system or by mail to anyone  
unable to accept electronic filing as indicated on the Notice of Electronic Filing.  
Parties may access this filing through the court's CM/ECF System.

/s/ Stephen J. Newman  
Stephen J. Newman

U.S. Mail

Welcome Trader's  
128 Dunfirth Ct  
Hayward, California 94542-7944

Rehman Trader's  
128 Dunfirth Ct  
Hayward, California 94542-7944

Sarib Rehman  
128 Dunfirth Ct  
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Mehlab Fatima  
128 Dunfirth Ct  
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